

USPS/NNA-T1-1. Please refer to your testimony on page 2, lines 11 through 16. You state, “Our membership numbers indicate that new newspapers are being started, and though some are being closed, overall our industry remains reasonabl[y] steady. The negative impacts we face are mostly from the general economic malaise in the nation, not from digital competition.” Please provide any documents you relied upon in support of the portion of your testimony quoted above.

USPS/NNA-T1-2. Please refer to your testimony on page 3, lines 28 through 29. You state, “The Postal Service has a special obligation to serve rural areas.” Please confirm that the basis for your claim is 39 U.S.C. § 101(b). Additionally, please identify any other statute, regulation, or policy that provides a basis for your assertion.

USPS/NNA-T1-3. Please refer to your testimony on page 8, lines 21 through 24. You state, “The loss of a local entry office would be enough to force many publishers out of the mail.” Please provide any documents you relied upon in support of your statement.

USPS/NNA-T1-4. Please refer to your testimony on page 11, lines 25 through 26. You state, “the Postal Service must maintain at least overnight delivery for our in-county and surrounding-county newspaper issues dropped at the delivery office.” (Emphasis in the original.) Please identify the statute, postal regulation, or policy that establishes this requirement.

USPS/NNA-T1-5. Please refer to your testimony on page 12, lines 24 through 25. You state, “As Postal Committee chairman, I have received some comments from publishers who have participated in these public meetings.” Please also refer to your testimony on page 12, lines 27 through 28. You state, “Here is an excerpt of an email I received earlier this month, with the names of the postal employees deleted.” Please produce a complete copy of this email message that includes the following information: the sender, the recipient, any information in the “cc” field, the subject, the date and time the email was sent, the text of the message, the text of any other message or communication that was attached, appended, or inserted into the email (i.e., the email string or thread), and copies of any attachments to the email.

USPS/NNA-T1-6. Please refer to your testimony on page 13, lines 31 through 33, and page 14, lines 1 through 2, and Appendix A. You state, “Curious to know how others were experiencing this community dialogue, NNA surveyed newspapers across the country using its own membership list, and asking for assistance from state level newspaper organizations to reach out to our non-members. The results of that discussion are attached here as Appendix A, with all the comments that were provided included.” Please also refer to subsection (k) of Rule 31 of the Commission’s Rules of Practice (39 C.F.R. § 3001.31).

- (A) Please provide all information required by Rule 31(k), including the following: a description of the study plan underpinning the survey described in your testimony, a clear description of the study design, all relevant assumptions underpinning the survey, the techniques or procedures used to compile the data set forth in Appendix A, the definition of the universe under study, and the sampling frame and units.
- (B) If not provided in response to subpart (A) above, please provide the following: the date (month, day, and year) on which the survey began and the date (month, day, and year) on which the survey ended (i.e., the survey period).
- (C) If not provided in response to subpart (A) above, please provide a complete copy of the survey, including all questions posed to survey participants, all instructions provided to survey participants, and complete copies of the individual survey responses received from participants. Names of specific individuals may be redacted.
- (D) If not provided in response to subpart (A) above, please provide the total number of persons who were provided with an opportunity to participate in the survey and the number of those persons who are not NNA members. Additionally, please provide the total number of survey respondents and the number of respondents who are not NNA members. Please also identify any criteria that were used to determine which persons would be provided with an opportunity to participate in the survey.
- (E) If not provided in response to subpart (A) above, please explain the nature and scope of the assistance NNA requested from “state level newspaper organizations” and what assistance was provided in response to NNA’s request.